Facility Identification Data
Name: SPEAR USA
Address: 6 MORRILL PL
FULTON, NY 13069

Owner/Firm
Name: SPEAR USA LLC
Address: 6 MORRILL PL
FULTON, NY 13069, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: JOSEPH M DLUGOLENSKI
Address: 615 ERIE BLVD WEST
SYRACUSE, NY 13204-2400
Phone:3154267438

Division of Air Resources:
Name: DAVID A WEAVER
Address: 615 ERIE BOULEVARD WEST
SYRACUSE, NY 13204-2400

Air Permitting Facility Owner Contact:
Name: KEVIN MILES
Address: SPEAR USA LLC
6 MORRILL PL
FULTON, NY 13069
Phone:3155920236

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.

Attainment Status
SPEAR USA is located in the town of FULTON in the county of OSWEGO.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status

Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description
This is a commercial printing facility producing packaging materials with rotogravure printing presses.

Permit Structure and Description of Operations
The Title V permit for SPEAR USA is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.
A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

SPEAR USA is defined by the following emission unit(s):
Emission unit U00C10 - This emission unit corresponds to the two emission points corresponding to the two

incinerators for Cerutti 8-color and Cerutti 11-color presses.
Emission unit U00C10 is associated with the following emission points (EP):
0C101, 0C102
It is further defined by the following process(es):
Process: 003 is located at Building MAIN - Washup (washup units, press wash and floor wash).
Process: 004 is located at Building MAIN - Renzmann washing unit
Process: 005 is located at Building MAIN - Cerutti8 8-color rotogravure press - printing operation.
Process: 006 is located at Building MAIN - Cerutti11 11-color rotogravure press - printing operation.

Emission unit U00C13 - This emission unit corresponds to one emission point for the 10,000 gallon tank for storing n-propyl acetate.
Emission unit U00C13 is associated with the following emission points (EP):
00C13
It is further defined by the following process(es):
Process: 009 is located at Building OUTSIDE MB - n-propyl acetate storage tank with conservation vent and submerged fill-standing losses
Process: 010 is located at Building OUTSIDE MB - n-propyl acetate storage tank with conservation vent and submerged fill - working losses

Emission unit U00C14 - This emission unit corresponds to one emission point for the 8,000 gallon compartment of a two-compartment tank with a total capacity of 10,000 gallons. This compartment is used to store ethyl alcohol.
Emission unit U00C14 is associated with the following emission points (EP):
00C14
It is further defined by the following process(es):
Process: 011 is located at Building OUTSIDE MB - Ethyl alcohol storage tank with conservation vent and submerged fill- standing losses
Process: 012 is located at Building OUTSIDE MB - Ethyl alcohol storage tank with conservation vent and submerged fill-working losses

Emission unit U00C15 - This emission unit corresponds to one emission point for the 2,000 gallon compartment of a two-compartment tank with a total capacity of 10,000 gallons. This compartment is used to store ethyl acetate.
Emission unit U00C15 is associated with the following emission points (EP):
00C15
It is further defined by the following process(es):
Process: 013 is located at Building OUTSIDE MB - Ethyl acetate storage tank with conservation vent and submerged fill- standing losses
Process: 014 is located at Building OUTSIDE MB - Ethyl acetate storage tank with conservation vent and submerged fill- working losses

Title V/Major Source Status
SPEAR USA is subject to Title V requirements. This determination is based on the following information:
The facility was previously a major source for VOC and HAP emissions. Some of the equipment has since been removed. Complying with the 40 CFR 63 subpart KK rule (MACT), requiring 95% reduction in VOC and HAP emissions, has brought the facility's emissions below the major source thresholds. However, the facility is still subject to the MACT and RACT rules under the "once in, always in" concept. Being subject to major source MACT requires the facility to operate under a Title V permit as opposed to a minor source permit.

Program Applicability
The following chart summarizes the applicability of SPEAR USA with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's(hydrofluorocarbons)or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2759	COMMERCIAL PRINTING, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorizeprocesses which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
4-01-002-98	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING OTHER NOT CLASSIFIED - CONVEYORIZED VAPOR DEGREASING
4-01-003-99	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Other Not Classified
4-05-005-11	PRINTING/PUBLISHING

	PRINTING/PUBLISHING - GENERAL Gravure - 2754
4-07-008-09	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ALCOHOLS Ethyl Alcohol: Breathing Loss
4-07-044-05	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ESTERS Ethyl Acetate: Breathing Loss
4-07-044-06	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ESTERS Ethyl Acetate: Working Loss
4-07-044-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ESTERS Specify Ester: Breathing Loss
4-07-044-98	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ESTERS Specify Ester: Working Loss

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000109-60-4	ACETIC ACID PROPYL ESTER		>= 2.5 tpy but < 10 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
007440-41-7	BERYLLIUM		> 0 but < 10 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 10 tpy but < 25 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
007440-48-4	COBALT		> 0 but < 10 tpy
025321-22-6	DICHLOROBENZENE		> 0 but < 2.5 tpy
000141-78-6	ETHYL ACETATE		>= 2.5 tpy but < 10 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)		>= 10 tpy but < 25 tpy
000050-00-0	FORMALDEHYDE		> 0 but < 10 tpy
0NY100-00-0	HAP		> 0 but < 2.5 tpy
000110-54-3	HEXANE		> 0 but < 10 tpy
000108-21-4	ISOPROPYL ACETATE		> 0 but < 2.5 tpy
000067-63-0	ISOPROPYL ALCOHOL		> 0 but < 2.5 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-96-5	MANGANESE		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL		> 0 but < 10 tpy
000142-82-5	N-HEPTANE		> 0 but < 2.5 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 10 tpy but < 25 tpy

0NY075-00-0	PARTICULATES	> 0 but < 2.5 tpy
0NY075-00-5	PM-10	> 0 but < 2.5 tpy
000071-23-8	PROPANOL	>= 2.5 tpy but < 10 tpy
007782-49-2	SELENIUM	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	> 0 but < 2.5 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 25 tpy but < 40 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: **Emergency Defense - 6NYCRR Part 201-1.5**

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: **Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part** 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: **Timely Application for the Renewal of Title V Permits - 6 NYCRR Part** 201-6.3(a)(4)
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: **Certification by a Responsible Official - 6 NYCRR Part** 201-6.3(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: **Requirement to Comply With All Conditions - 6 NYCRR Part** 201-6.5(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: **Permit Revocation, Modification, Reopening, Reissuance or** Termination, and Associated Information Submission Requirements - 6 **NYCRR Part 201-6.5(a)(3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: **Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6(b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.
NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: **General Provisions for State Enforceable Permit Terms and Condition -**
6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY		64	Powers and Duties of the

			Department with respect to air pollution control
U-00C10	40CFR 63-KK.823	40	Printing and Publishing NESHAP-standard: general
U-00C10	40CFR 63-KK.825(b)(7)	41	Printing and Publishing NESHAP- standard: product and packaging rotogravure and wide-web flexographic printing
U-00C10	40CFR 63-KK.825(d)(1)	42, 43	Printing and Publishing NESHAP- demonstration of compliance with overall organic HAP control efficiency
U-00C10/-/005/TEC02	40CFR 63-KK.825(d)(1)	55	Printing and Publishing NESHAP- demonstration of compliance with overall organic HAP control efficiency
U-00C10/-/006/TEC02	40CFR 63-KK.825(d)(1)	57	Printing and Publishing NESHAP- demonstration of compliance with overall organic HAP control efficiency
U-00C10	40CFR 63-KK.828(a)(2)(i	44	
U-00C10	40CFR 63-KK.828(a)(4)(i	45	
U-00C10	40CFR 63-KK.828(b)	46	Printing and Publishing NESHAP-monitoring requirements
U-00C10	40CFR 63-KK.829(a)	47	Printing and Publishing NESHAP- Recordkeeping
U-00C10	40CFR 63-KK.829(b)	48	Printing and Publishing NESHAP- Recordkeeping
U-00C10	40CFR 63-KK.830(a)	49	Printing and Publishing NESHAP- Reporting requirements
U-00C10	40CFR 63-KK.830(b)(5)	50	Printing and Publishing NESHAP- Reporting requirements
U-00C10	40CFR 63-KK.830(b)(6)	51	Printing and Publishing NESHAP- Reporting requirements
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
U-00C10	6NYCRR 200.7	27	
FACILITY	6NYCRR 201-1.4	65	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 25, 26	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	
FACILITY	6NYCRR 201-6.5(a)(7)	2	
FACILITY	6NYCRR 201-6.5(a)(8)	16	
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for

			Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	17	
FACILITY	6NYCRR 201-6.5(e)	6	
FACILITY	6NYCRR 201-6.5(f)(6)	18	
FACILITY	6NYCRR 201-6.5(g)	24	
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	66	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
U-00C10	6NYCRR 212.4(c)	28	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 215	9	
U-00C10/-/003/WASUP	6NYCRR 226	52	SOLVENT METAL CLEANING PROCESSES
U-00C10/-/004/RENZM	6NYCRR 226	53	SOLVENT METAL CLEANING PROCESSES
U-00C13	6NYCRR 229.3(e)(2)(iv)	58	Volatile organic liquid storage tanks
U-00C14	6NYCRR 229.3(e)(2)(v)	60	Volatile organic liquid storage tanks
U-00C15	6NYCRR 229.3(e)(2)(v)	62	Volatile organic liquid storage tanks
U-00C13	6NYCRR 229.5(d)	59	Recordkeeping - VOL storage tanks
U-00C14	6NYCRR 229.5(d)	61	Recordkeeping - VOL storage tanks
U-00C15	6NYCRR 229.5(d)	63	Recordkeeping - VOL storage tanks
U-00C10	6NYCRR 234.3(a)(3)(ii)	29	control requirements - packaging rotogravure
U-00C10	6NYCRR 234.3(a)(3)(iv)	30	
U-00C10	6NYCRR 234.3(e)	31	Graphic Arts - control requirements - opacity
U-00C10	6NYCRR 234.4(a)	32	Testing, monitoring, and recordkeeping
U-00C10	6NYCRR 234.4(b)(1)	33	testing, monitoring and recordkeeping
U-00C10	6NYCRR 234.4(b)(3)	34	Testing, Monitoring and Recordkeeping - purchase, usage and/or production records for inks, VOC and solvents
U-00C10	6NYCRR 234.4(c)(1)	35	
U-00C10	6NYCRR 234.4(c)(2)	36	temperature rise across bed
U-00C10	6NYCRR 234.4(c)(4)	37, 38	Testing, Monitoring and Recordkeeping - continuous parametric monitoring for air cleaning devices
U-00C10/-/005/TEC02	6NYCRR 234.4(c)(4)	54	Testing, Monitoring and Recordkeeping - continuous parametric monitoring for air cleaning devices
U-00C10/-/006/TEC02	6NYCRR 234.4(c)(4)	56	Testing, Monitoring and Recordkeeping - continuous parametric monitoring for air

U-00C10	6NYCRR 234.6	39	cleaning devices Handling, storage and disposal of volatile organic compounds (VOC).

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart.
All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made

available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart

recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 201-6.5(g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215
Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, SPEAR USA has been determined to be subject to the following regulations:

40CFR 63-KK.823
Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.

40CFR 63-KK.825 (b) (7)

The owner or operator of a product and packaging rotogravure or a wide-web flexographic printing press that is utilizing a control device to comply with subpart KK shall operate the capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month.

40CFR 63-KK.825 (d) (1)

To demonstrate compliance with the overall organic HAP control efficiency requirements in section 63.825(b)(7) or the overall organic HAP emission rate limitation requirements in section 63.825(b)(8)-(10), each owner or operator using an oxidizer to control emissions shall show compliance by following the procedures in either paragraph (d)(1) or (d)(2) of section 63.825.

40CFR 63-KK.828 (a) (2) (ii)
All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to

manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced.

The replacement shall be done either if the owner chooses not to perform the calibration or if the equipment can not be calibrated properly.

40CFR 63-KK.828 (a) (4) (ii)

An owner or operator complying with the requirements of 40CFR63.824-63.825 through the use of a catalytic oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

40CFR 63-KK.828 (b)

Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a)(4) and (a)(5) of this section, unless otherwise excused, shall be considered a violation of the emission standard.

40CFR 63-KK.829 (a)

The record keeping provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR63 Subpart KK are listed in Table 1 of 40CFR63 Subpart KK.

40CFR 63-KK.829 (b)

Each owner or operator of an affected major source that is subject to 40CFR Part 63 Subpart KK shall maintain records (as specified in paragraphs (b)(1) and (b)(3) of Section 63.829) on a monthly basis, in accordance with the requirements of 40CFR63.10(b)(1).

40CFR 63-KK.830 (a)

The reporting provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR Part 63 Subpart KK are listed in Table 1 of Subpart KK.

40CFR 63-KK.830 (b) (5)

Each owner or operator of an affected source subject to 40CFR63 Subpart KK that is using a control device to comply with Subpart KK shall submit start-up, shutdown, and malfunction reports as specified in Section 63.10(d)(5).

40CFR 63-KK.830 (b) (6)

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Summary Report, as specified in 40CFR63.10(e)(3), on a semi-annual basis.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 226
This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyorized and cold cleaning degreasers.

6NYCRR 229 .3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6NYCRR 229 .3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6NYCRR 229 .5 (d)
This section requires facilities subject to the requirements under Part 229.3, to maintain a record of the capacity of the volatile organic liquid storage tanks, in gallons, for a period of 5 years.

6NYCRR 234 .3 (a) (3) (ii)
The capture system and air cleaning device must be designed and operated such that the following minimum overall removal efficiencies of volatile organic compounds is achieved:

- packaging rotogravure processes - 65%

The overall removal efficiency is determined by (1) testing the capture efficiency of the removal system; and (2) testing the destruction efficiency. The testing methods used to determine the overall removal efficiency must be approved in advance by the DEC.

6NYCRR 234 .3 (a) (3) (iv)
The overall removal efficiency is determined by (1) testing the capture efficiency of the removal system; and (2) testing the destruction efficiency. The testing methods used to determine the overall removal efficiency must be approved in advance by the DEC.

6NYCRR 234 .3 (e)
The emissions to the outdoor atmosphere may not exceed an average opacity greater than 10% for any consecutive six-minute period from any emission source subject to Part 234.

6NYCRR 234 .4 (a)
This requirement applies to printing operations which utilize control equipment to control emissions. It requires that test methods acceptable to the Department must be used when demonstrating the overall removal efficiency. This demonstration may be done in the following manner:

(1) By directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Methods described in Section 234.5(b)(1) and (b)(2) of this Part must be used.

(2) For control equipment other than VOC/solvent recovery, this demonstration must include provisions provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

6NYCRR 234 .4 (b) (1)
The United States Environmental Protection Agency has approved several test methods for determining the concentration of a particular contaminant in flue gas. These methods can be found at 40 CFR 60, Appendix A.

6NYCRR 234 .4 (b) (3)
The facility is required to maintain records of purchases and usage of inks, volatile organic compounds, and solvents. The facility maintains these records in a log book for a minimum of five years.

6NYCRR 234 .4 (c) (1)
This regulation requires any affected printing operation which uses an incinerator as an air cleaning device to control VOC emissions to install, operate and periodically calibrate instrumentation to monitor the exhaust gas temperature.

6NYCRR 234 .4 (c) (2)
The temperature rise across the catalytic bed must be continuously monitored.

6NYCRR 234 .4 (c) (4)
The facility is required to continuously monitor the following parameters: press room differential pressure and inlet to incinerator catalyst bed.

6NYCRR 234 .6
This requirement pertains to general provisions for the handling, storage and disposal of volatile organic compounds and applies to open containers except where production, sampling, maintenance or inspection procedures require operation access; and to actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Compliance Certification
Summary of monitoring activities at SPEAR USA:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-00C10	42	monitoring of process or control device parameters as surrogate
U-00C10	43	record keeping/maintenance procedures
U-00C10/-/005/TEC02	55	monitoring of process or control device parameters as surrogate
U-00C10/-/006/TEC02	57	monitoring of process or control device parameters as surrogate
U-00C10	46	record keeping/maintenance procedures
U-00C10	48	record keeping/maintenance procedures
U-00C10	50	record keeping/maintenance procedures
U-00C10	51	record keeping/maintenance procedures
U-00C10	27	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures

FACILITY	7	record keeping/maintenance procedures
U-00C10	28	intermittent emission testing
U-00C10/-/003/WASUP	52	record keeping/maintenance procedures
U-00C10/-/004/RENZM	53	record keeping/maintenance procedures
U-00C13	58	record keeping/maintenance procedures
U-00C14	60	record keeping/maintenance procedures
U-00C15	62	record keeping/maintenance procedures
U-00C13	59	record keeping/maintenance procedures
U-00C14	61	record keeping/maintenance procedures
U-00C15	63	record keeping/maintenance procedures
U-00C10	29	intermittent emission testing
U-00C10	31	monitoring of process or control device parameters as surrogate
U-00C10	34	record keeping/maintenance procedures
U-00C10	37	record keeping/maintenance procedures
U-00C10	38	monitoring of process or control device parameters as surrogate
U-00C10/-/005/TEC02	54	monitoring of process or control device parameters as surrogate
U-00C10/-/006/TEC02	56	monitoring of process or control device parameters as surrogate
U-00C10	39	record keeping/maintenance procedures

Basis for Monitoring

40 CFR 63 Subpart KK

Continuous monitoring of of catalyst bed inlet temperature is required for catalytic oxidizers. Also, the rule requires monitoring of capture systems. This permit contains monitoring of press room differential pressure to verify 100% capture in a permanent total enclosure.

6NYCRR Part 229

Annual inspections are required to ensure submerged fill and conservation vent systems are working properly.

6NYCRR Part 234

The same press room control systems are used to comply with this rule as with 40 CFR 63 Subpart KK, so similar monitoring is included in the permit for 6NYCRR Part 234.

6NYCRR Part 200.7

The catalyst beds of the incinerators are required to be sampled and tested once per year to ensure proper destruction of pollutants is being achieved.